

Before the  
Federal Communications Commission  
Washington, D. C. 20554

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FCC MAIL ROOM

In the Matter of )  
 )  
Replacement of Part 90 )  
by Part 88 to Revise )  
the Private Land Mobile )  
Radio Services and Modify )  
the Policies Governing them )

PR Docket 92-235

To: The Commission

COMMENT OF  
WALTER A. NEAVES, P.E.

I, Walter A. Neaves, a Professional Engineer in Texas, offer the following response to the Commission's Notice of Proposed Rule Making in this proceedings.

1. I think that the proposed changes will cause a tremendous waste of money. This proposal would mandate a multi-billion dollar investment in two-way radio equipment by the private sector and the government. It proposes that everyone to just thrown away their present equipment and purchase new systems. Their existing equipment will have little or no salvage value, because it no longer be usable in the United States. Consider this; most of the present systems work well and the newer radios have many years of useful life. Nearly all of it is paid for and the only cost to operate it is annual maintenance - a minor budget item in most organizations. If the proposed changes take effect everyone in the United States using radios will be forced to become re-licensed, every system will have to be re-designed, and all new equipment will have to be purchased at considerable cost to every single user! Many of the new systems may not work as good as the old ones. This would truly be a dream-come-true to the major radio equipment manufacturers - but it would certainly be an unfair thing to do to the people who would have to pay for it.

2. I feel that there are numerous alternatives to spectrum refarming of the most heavily used two-way radio bands. This is not the first time that more room was needed for land mobile users. First, I suggest that you look at the vast spectrum of lightly loaded frequencies reserved for the Federal Government. There are many

megahertz which lie dormant because they are reserved for government use. They have been quiet for as long as I can remember, because the government thought that they may need them some day. It was good thinking in 1950, but a lot of things have changed. I think it is time to take another look. Re-allocation of unused government frequencies would make a lot more room than refarming the existing heavily populated bands.

3. I think it is time to take another bite out of the UHF TV channels. With the prolific growth of cable TV and satellite TV systems, the need for additional conventional TV stations is not as great as once projected. Another 100 Mhz of UHF spectrum could be taken and re-allocated as needed, without any significant impact on the TV industry or service to the public. The cost would be negligible compared to this NPRM.

4. There are serious technical deficiencies in the systems proposed by this NPRM. In simple terms, it may not work as envisioned. You had better consider carefully the comments of APCO and others who are worried about the technical aspects of this proposal. Competent field technicians are saying that the technical standards proposed are unproved and they see serious problems. I would want some actual field tests with reasonably priced equipment to evaluate if it can perform to proposed standards - before forcing that the entire nation throw away their proven and paid-for equipment and purchasing something which may or may not work as well - at some presently unknown cost.

5. Finally, I think that this proposal would create a completely unnecessary expense to the Federal Government at a time when deficit reduction and balanced budgets should be top priority. The Federal Government must start considering the practicality and economic feasibility of its actions on itself! The expense of this proposal mind boggling. The total cost of it would rival the cost of the Gulf War! The Government has a lot of radio systems which will be made obsolete by this proposal, so the Federal Government's share of this cost would be substantial. Has anyone estimated this cost to the Federal Government? Just how are the various agencies going to get the money to replace their systems in 1996 - with an administration trying desperately to make a showing so it can stay in office?

Thank you for considering my comments.

Respectfully submitted,  
Walter A. Neaves, Professional Engineer

Walter A. Neaves